

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re CHRISTOPHER VALUNTAS : CHAPTER 13
:
Debtor(s) : BANKRUPTCY NO. 20-10250

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor(s), Christopher Valuntas, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by Specialized Loan Servicing, LLC as servicer for HSBC Bank USA, National Association, as Trustee for Wells Fargo Alternative Loan 2007-PA3 Trust on February 1, 2021. Debtors believe they can become current on all post-petition payments due under the July 24, 2020 stipulation with the Lender, and is also in the midst of completing a loan modification application.

Respectfully submitted,

/s/ Paul H. Young
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